



CERTIFICATE OF COMPLIANCE

No. 22-212

JONATHAN SAVAS, ET AL.,

Petitioners,

v.

CALIFORNIA STATE LAW ENFORCEMENT
AGENCY, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Protect the First Foundation Supporting Petitioners contains 3,391 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2022.

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Donna J. Moore
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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: December 2, 2022

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023